



UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF NEW YORK

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ANDREW RINGEL,

Plaintiff,

-against-

VERDICT FORM

NEW YORK CITY DEPARTMENT OF
EDUCATION, NAIYMA MOORE-
ALLEN, and MIATHERESA PATE,

19-CV-2374 (TAM)

Defendants.
-----X

PLEASE MARK YOUR ANSWER WITH AN "X"

Hostile Work Environment Claims

1. Has Mr. Ringel proved, by a preponderance of the evidence, that Defendant New York City Department of Education ("DOE") is liable for the creation of a **hostile work environment**, in violation of **Title VII of the Civil Rights Act of 1964**?

Yes _____ No X

2. Has Mr. Ringel proved, by a preponderance of the evidence, that Defendants are liable for the creation of a **hostile work environment**, in violation of the **New York State Human Rights Law**:

- a. As to Defendant New York City DOE?

i. Yes _____ No X

- b. As to Naiyma Moore-Allen?

Yes _____ No X

- c. As to Miatheresa Pate?

Yes _____ No X

[please proceed to page 2]

3. If you answered yes to any questions in Question 1 and 2, have Defendants proved, by a preponderance of the evidence, that Defendants took sufficient remedial action by (a) exercising reasonable care to prevent and promptly correct any discriminatory behavior directed against Plaintiff and (b) that Plaintiff failed to take advantage of other preventive or corrective opportunities that Defendants provided or failed to avoid harm otherwise?

Yes _____ No X

4. Has Mr. Ringel proved, by a preponderance of the evidence, that Defendants are liable for the creation of a **hostile work environment**, in violation of the **New York City Human Rights Law**:

- a. As to Defendant New York City DOE?

Yes _____ No X

- b. As to Naiyma Moore-Allen?

Yes _____ No X

- c. As to Miatheresa Pate?

Yes _____ No X

Retaliation Claims

5. Has Mr. Ringel proved, by a preponderance of the evidence, that he was subjected to **retaliation**, in violation of **Title VII of the Civil Rights Act of 1964**, when Defendant DOE terminated his employment?

- a. Yes _____ No X

- b. *If your answer to question 5 is yes, on which of the following bases do you unanimously find that Mr. Ringel has established he was subjected to retaliation:*

Complaints regarding the hostile work environment created by J.J.

Yes _____ No X

Complaints regarding the employer's failure to address the hostile work environment

Yes _____ No X

[please proceed to page 3]

6. Has Mr. Ringel proved, by a preponderance of the evidence, that he was subjected to **retaliation**, in violation of **the New York State Human Rights Law**, when Defendants terminated his employment:

a. By Defendant DOE?

i. Yes _____ No X

ii. *If your answer to question 6(a) is yes, on which of the following bases do you unanimously find that Mr. Ringel has established he was subjected to retaliation:*

Complaints regarding the hostile work environment created by J.J.

Yes _____ No X

Complaints regarding the employer's failure to address the hostile work environment

Yes _____ No X

b. By Defendant Naiyma Moore-Allen?

i. Yes _____ No X

ii. *If your answer to question 6(b) is yes, on which of the following bases do you unanimously find that Mr. Ringel has established he was subjected to retaliation:*

Complaints regarding the hostile work environment created by J.J.

Yes _____ No X

Complaints regarding the employer's failure to address the hostile work environment

Yes _____ No X

c. By Defendant Miatheresa Pate?

i. Yes _____ No X

ii. *If your answer to question 6(c) is yes, on which of the following bases do you unanimously find that Mr. Ringel has established he was subjected to retaliation:*

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Complaints regarding the hostile work environment created by J.J.

Yes _____ No X

Complaints regarding the employer's failure to address the hostile work environment

Yes _____ No X

7. Has Mr. Ringel proved, by a preponderance of the evidence, that he was subjected to **retaliation**, in violation of the **New York City Human Rights Law**, when Defendants terminated his employment:

a. By Defendant DOE?

i. Yes _____ No X

- ii. *If your answer to question 7(a) is yes, on which of the following bases do you unanimously find that Mr. Ringel has established he was subjected to retaliation:*

Complaints regarding the hostile work environment created by J.J.

Yes _____ No X

Complaints regarding the employer's failure to address the hostile work environment

Yes _____ No X

b. By Defendant Naiyma Moore-Allen?

i. Yes _____ No X

- ii. *If your answer to question 7(b) is yes, on which of the following bases do you unanimously find that Mr. Ringel has established he was subjected to retaliation:*

Complaints regarding the hostile work environment created by J.J.

Yes _____ No X

Complaints regarding the employer's failure to address the hostile work environment

Yes _____ No X

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c. By Defendant Miatheresa Pate?

i. Yes _____ No X

ii. *If your answer to question 7(c) is yes, on which of the following bases do you unanimously find that Mr. Ringel has established he was subjected to retaliation:*

Complaints regarding the hostile work environment created by J.J.

Yes _____ No X

Complaints regarding the employer's failure to address the hostile work environment

Yes _____ No X

Please sign and date this form and write the Court indicating that you have completed your deliberations as to these questions. Please do not include any indication of your findings in your note.

Signature of Foreperson

5/12/25
Date